

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

JASON BAKER, JOHN BREWSTER, JOANN BREWSTER,
MAXINE CONDON, KAREN FARRELL, BROOKS
LIDDIARD, JANET LIDDIARD, JAMES MCDERMOTT,
HEIDI MCDERMOTT, PAUL MOREY, DONETTA
MOREY, JOE TODD, BONNIE TODD, TOM WHIPPLE
and PAULINE WHIPPLE,

Plaintiffs,

-against-

ANSCHUTZ EXPLORATION CORPORATION, CONRAD
GEOSCIENCE CORPORATION, PATHFINDER ENERGY
SERVICES, INC. and JOHN and JANE DOES 1 through 100,

Defendants.

NOTICE OF MOTION

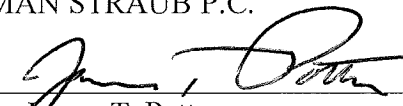
6:11-CV-06119 (CJS)

PLEASE TAKE NOTICE that, upon the annexed affidavit of John Conrad, sworn to the 22nd day of March, 2011, and the accompanying memorandum of law, defendant Conrad Geoscience Corp. will move this Court before the Honorable Charles J. Siragusa, at the United States District Court for the Western District of New York, Kenneth B. Keating Federal Building, 100 State Street, Rochester, New York, at a date and time to be determined by this Court, for an order pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure dismissing the Complaint with prejudice against defendant Conrad Geoscience Corp. on the ground that plaintiffs have failed to state a cause of action against defendant Conrad Geoscience Corp. upon which relief can be granted, and for such other and further relief as to the Court may be just and proper.

Dated: Albany, New York
March 24, 2011

HINMAN STRAUB P.C.

By


James T. Potter

Attorneys for Defendant Conrad Geoscience
121 State Street
Albany, NY 12207
518-436-0751
Fax: 518-436-4751
Email: jpotter@hinmanstraub.com

TO: Marc J. Bern, Esq.
Napoli Bern Ripka & Associates, LLP
Attorneys for Plaintiffs
3500 Sunrise Highway, Ste. T-207
Great River, NY 11739

Christopher D. Thomas, Esq.
Nixon Peabody LLP
Attorneys for Defendant Anschutz
Clinton Square
P. O. Box 31051
Rochester, NY 14603

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

JASON BAKER, JOHN BREWSTER, JOANN BREWSTER,
MAXINE CONDON, KAREN FARRELL, BROOKS
LIDDIARD, JANET LIDDIARD, JAMES MCDERMOTT,
HEIDI MCDERMOTT, PAUL MOREY, DONETTA
MOREY, JOE TODD, BONNIE TODD, TOM WHIPPLE
and PAULINE WHIPPLE,

Plaintiffs,

-against-

ANSCHUTZ EXPLORATION CORPORATION, CONRAD
GEOSCIENCE CORPORATION, PATHFINDER ENERGY
SERVICES, INC. and JOHN and JANE DOES 1 through 100,

Defendants.

STATE OF PENNSYLVANIA }
 } ss.:
COUNTY OF ALLEGHENY }

AFFIDAVIT

Civil Action No.
6:11-cv-06119 CJS

JOHN CONRAD, being duly sworn, deposes and says:

1. I am the President of Conrad Geoscience Corporation, one of the Defendants in this action. I submit this affidavit in support of Conrad's motion to dismiss the complaint based upon my personal knowledge.
2. Conrad Geoscience Corporation is an environmental consulting firm located in Poughkeepsie, New York.
3. In early June of 2010, Conrad Geoscience Corp. was retained by Anschutz Exploration Corporation ("Anschutz") for the purpose of investigating the complaint of Mr. and Mrs. Frances Dennison, residents of Big Flats, New York, regarding a sulfur odor and

turbidity conditions in their well water and the possibility that the reported water quality conditions were the result of Anschutz's drilling of a nearby natural gas well, known as the Dow 1 Well.

4. On June 8, 2010, I conducted an inspection of the Dennison residence to determine whether the reported odor and turbidity could have been caused by the Dow 1 Well. This inspection consisted of a physical inspection of the Dennison property and the collection of two water samples from the Dennison's water well. Prior to conducting the inspection, I reviewed drilling logs from the Dow 1 and Dow 2 Wells and maps showing the locations of the wells.

5. Upon information and belief, the Dennisons have used a hydrogen sulfide treatment system for years to control sulfur odors from their well water. I observed this system during my inspection on June 8, 2010.

6. Upon information and belief, the New York State Electric and Gas Corporation installed an electric transmission tower approximately 300 feet from the Dennison water well within the month prior to my inspection. At the time of my inspection I observed construction equipment still remaining at the site of the electric transmission tower.

7. On June 24, 2010, I submitted a written report on behalf of Conrad Geoscience Corp. of my findings and conclusions from the investigation of the Dennison residence to Anschutz. A copy of my report is annexed hereto as Exhibit "A." Testing of the water samples drawn from the Dennison well indicated that the samples did not exceed applicable standards or guidance values for the parameters analyzed. In my report, I concluded that the sulfur odor appeared to predate drilling at the Dow 1 Well and concluded that there was no evidence

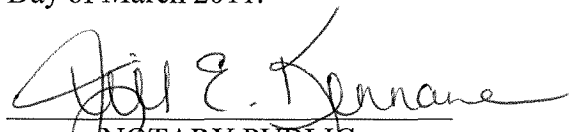
linking the presence of hydrogen sulfide in the Dennison well to drilling activity at the Dow 1 site.

I also concluded that the turbidity condition in the Dennison well could potentially be a temporary condition that may have been caused by the recent construction of the electric transmission tower within 300 feet of the Dennison's well. Furthermore, I concluded that the particles causing the turbidity in the Dennison well could not have originated at the Dow 1 site because (1) the Dow 1 Well is hydraulically down-gradient of the Dennison well, and (2) the Dow 1 Well was cased and cemented through the shallow drinking water aquifer.

8. At the time I inspected the Dennison well, I was not requested by Anschutz to conduct any investigation of possible contamination at other properties, nor was I asked to investigate any possible contamination of the Plaintiffs' properties. My investigation was confined exclusively to the Dennison property.


JOHN A. CONRAD

Sworn to before me this 22nd
Day of March 2011.


NOTARY PUBLIC

COMMONWEALTH OF PENNSYLVANIA

Notarial Seal
Jill E. Kennane, Notary Public
Reserve Twp., Allegheny County
My Commission Expires Oct. 15, 2011

Member, Pennsylvania Association of Notaries
4815-0656-3337, v. 2

Exhibit "A"



CONRAD GEOSCIENCE CORP.

www.conradgeo.com

Environmental Scientists

One Civic Center Plaza, Suite 501, Poughkeepsie, New York 12601 • 845/454-2544 • fax: 845/454-2655

June 24, 2010

Jerry Gentry
Operations Manager
Anschutz Exploration Corporation
555 17th St., Suite 2400
Denver, Colorado 80202

Re: Dennison Residence, Big Flats, Chemung Co., NY
Conrad Geoscience File #AC100120

Dear Mr. Gentry:

I understand that on June 1, 2010, Anschutz Exploration Corporation (AEC) became aware of a landowner concern about water quality near one of its drilling sites. AEC retained Conrad Geoscience Corp. to help determine whether activity at the Dow #1 site could be related to reported changes in water quality at the Dennison residence.

On June 8, from approximately 7:30 to 8:45 p.m., I inspected the Dennison residence at 178 Yawger Road, Big Flats, Chemung County, New York. David Perazone, of Mason Dixon Energy, accompanied me. Access to the house was provided by Frank Dennison and his wife. Photos from the inspection are attached.

Prior to the inspection I reviewed daily drilling logs from the Dow #1 and #2 wells, and maps showing their locations. In a phone conversation on June 7, Mr. Brian Coven explained that the Dennisons suspected that odors and turbidity in their well water might be somehow related to drilling activity at the Dow #1 site.

My inspection on June 8 started with the exterior grounds of the Dennison residence. The water supply for the residence is a well in the front yard, between the house and Yawger Road. The well itself was not visible and is accessed by ladder through an opening into an underground concrete chamber whose floor is 8 feet below grade. Mr. Dennison indicated that the well sticks up about 12 inches above the vault floor and is situated approximately 14 feet west of the vault opening. He indicates that the well is approximately 185 feet deep and has a submersible pump. The Dennisons replaced the pump 3 years ago after the previous one burned out.

The septic tank is located in the backyard approximately 12 feet from the southeastern, rear corner of the house. The septic leachfield is located approximately 30 feet downslope from the septic tank.

Anschutz Exploration Corporation
#AC100120
June 24, 2010
Page 2

The Dennisons use propane as a fuel source. A 500-gallon aboveground propane tank is located in the yard south of the house. An unnamed stream flows roughly west to east along the northern property boundary.

There is a newly erected electric transmission tower approximately 300 feet from the Dennison water well (tall grey tower in attached photos). This tower was recently installed by New York State Electric & Gas Corp. According to Mr. Dennison, erection of this tower involved drilling equipment and emplacement of a large concrete base, and this construction activity occurred within the last month. Construction equipment is still present next to the tower.

Mr. Dennison indicated that they had lived in the house since 1977. He stated that the well water has always had a sulfur odor, but the odor had worsened during the last month or so. Mr. Dennison indicated that they have used a hydrogen sulfide treatment system for many years to control sulfur odors in their well water. During my inspection Mr. Dennison ran water into the washing machine in the basement and there was an obvious sulfur odor.

He also described sediment residue in the bathtub after draining it, which dried to a fine gray powder. He showed me wipe samples he had collected using paper towels. The tub was clean at the time of my inspection. I did not observe any settled accumulation of sediment in the toilet tank in the bathroom.

Mr. Dennison also described sediment accumulation in the prefilter of the hydrogen sulfide treatment system in the basement, and he indicated that increased turbidity had caused the prefilter to clog. The clear plastic filter in place during my inspection had a light gray discoloration visible on the filter media. He showed me a used prefilter that had dark gray or black particles in it, and a sample of tapwater he had collected (marked June 8) which contained a small amount of dark gray or black silt-sized sediment.

Mr. Dennison stated at various times during my inspection that he had first noticed a turbidity condition about 4 weeks prior, or possibly 6 weeks or 7 weeks prior. He indicated that the turbidity had recently decreased, but he still notices a gray discoloration to the water. He also mentioned that the water became bubbly for a period of a day or two at or near the time that turbidity increased.

Dow #1 Well

The Dow #1 well is approximately 1,400 feet southwest of the Dennison supply well (maps attached). Conductor casing for Dow #1 was installed using air rotary methods to a depth of 56 feet and cemented in place as of March 3, 2010. The Dow #1 hole was deepened to 674 feet between April 26 and 28 via air rotary, and a second string of casing was cemented in place by May 4. By May 11 air rotary drilling on Dow #1 had advanced to a depth of 5,740 feet, at least 5,555 feet deeper than the Dennison well.

Water Sampling

During my inspection I collected two well water samples from the Dennison water well. Sample W-1 is raw, untreated well water collected from a bypass tap positioned before the hydrogen sulfide treatment system. Sample W-2 is well water collected from the kitchen tap. Water from the kitchen tap and all other taps in the house is treated by the hydrogen sulfide removal system.

CONRAD GEOSCIENCE CORP.



Anschutz Exploration Corporation
 #AC100120
 June 24, 2010
 Page 3

On June 9 Conrad Geoscience shipped the two water samples to Paradigm Environmental Services, a NYSDOH-certified laboratory in Rochester, NY. Duplicate samples were hand-delivered to Smith Laboratories, a NYSDOH-certified laboratory in Hyde Park, NY. Smith Laboratories analyzed both samples for coliform bacteria. Paradigm Environmental analyzed the samples for volatile organic compounds (VOCs) and a variety of inorganic parameters.

Neither VOCs nor bacteria were detected in Samples W-1 or W-2; and neither water sample exceeded applicable standards or guidance values for the other parameters analyzed. All parameters analyzed were either nondetectable or below applicable standards or guidance values for public water systems. It is important to note that private residential wells are not subject to regulation in New York, but public water standards are often informally adopted for individual residential systems. Results are summarized in Table 1, below.

Table 1. **Inorganic Parameters in Well Water Samples W-1 and W-2; collected June 8, 2010; Dennison Residence, Yawger Road, Big Flats, New York; Conrad Geoscience File #AC100120**

Constituent	DOH Drinking Water Standard ¹	Sample Identification	
		W-1 Untreated Basement	W-2 Kitchen Tap
Volatile Organic Compounds			
Chloride	250	75.2	79.6
Nitrate	10 ^{2,3}	0.349	ND<0.010
Sulfate	250	34.3	45.6
Alkalinity, Total	N/A	285	280
Nitrite	1 ^{2,3}	ND<0.01	ND<0.01
pH	N/A	8.7 H	8.8 H
Sulfide	N/A	ND<0.10	ND<0.10
Turbidity	NA ⁴	2.6	2.7
Manganese	0.3 ⁵	ND<0.0100	ND<0.0100
Lead	0.015	ND<0.001	ND<0.001
Hardness	N/A	4.97 B	4.32 B
Iron	0.3 ⁶	0.426	ND<0.100
Sodium	270 ⁶	195	211

Notes:

All concentrations are in mg/L unless otherwise indicated;

ND = Not detected, detection limit listed;

N/A = No applicable standard;

Boldface type designates those compounds detected at concentrations exceeding NYSDOH standard;

H = Analyzed outside of holding time;

B = Method blank contained trace levels of analyte;

1 - Standards are for Public Water Systems according to DOH Part 5, Subpart 5-1 and are recommended for individual residential systems.

2 - Limit specifies mass of nitrogen within compounds;

3 - Sum of Nitrate and Nitrite not to exceed 10 mg/L;

4 - Value is given in NTUs.

5 - If iron and manganese are present, the total concentration of both should not exceed 500 ug/L

6 - No standard limit; recommended guidance value

CONRAD GEOSCIENCE CORP.



Anschutz Exploration Corporation
#AC100120
June 24, 2010
Page 4

Conclusions

The sulfur odor in the Dennison well appears to predate drilling activity at the Dow #1 site by many years. While Mr. Dennison indicates that the sulfur odor seemed stronger during the month prior to my inspection, he also concedes that this well has always had elevated hydrogen sulfide concentrations that required treatment with a whole-house filtration system. Changes in hydrogen sulfide concentration can change seasonally or in response to many factors. Consequently, there is no way to link the presence of hydrogen sulfide in the Dennison well to drilling activity at the Dow #1 site.

Air rotary drilling can sometimes pressurize and aerate the shallow freshwater aquifer, which can cause turbidity to temporarily increase in nearby wells. The Dennison well is approximately 1,400 feet from the Dow #1 well. This horizontal separation is 1,250 feet farther than the 150 foot lateral separation recommended by NYSDEC for gas drilling near residential wells, and 400 feet farther than the 1,000 foot separation recommended by DEC for public water supply wells. Given the significant distance between the Dow #1 well and the Dennison well, an impact from air rotary drilling is highly unlikely. If air pressure was lost to the formation during drilling of Dow #1, the period of potential impact to the Dennison well would have been between April 25 and May 4 when Dow #1 was being deepened, cased and cemented across the equivalent zone in which the Dennison well is completed. It is unlikely, that pressure lost to the formation during this process could have dislodged sediment at the Dennison well, leading to increased turbidity. Based on information given by Mr. Dennison, the timing of an increase in turbidity is uncertain. Mr. Dennison originally reported noticing turbidity in his well water on or around May 11, after the above referenced April 25 – May 4 period had passed. However, Mr. Dennison later indicated that turbidity may have increased as early as April 20 or 27, which partially overlaps with the above referenced April 25 – May 4.

Given that the turbidity condition described by Mr. Dennison has lessened in recent weeks, it seems reasonable to conclude that the condition was temporary.

Because the Dow #1 well is hydraulically down-gradient of the Dennison well, drilling fluids or other substances at the Dow #1 site would not be expected to move up-gradient toward the Dennison well. In any case, because the Dow #1 well was cased and cemented through the shallow drinking water aquifer, drilling fluids or other substances in use at the Dow #1 site could not have entered the drinking water aquifer. Therefore, particles causing turbidity in the Dennison well could not have originated at the Dow #1 site.

Water samples W-1 and W-2, which represent treated and untreated water quality from the Dennison well, respectively, do not exceed applicable standards or guidance values for the parameters analyzed. All parameters analyzed were either nondetectable, below applicable standards or guidance values, or within expected ranges.

Mr. Dennison advises us that drilling and construction activity occurred when NYSEG installed a utility transmission tower immediately adjacent to his backyard, and that this activity coincided with the onset of the turbidity and odor conditions he describes. While it is not possible to determine whether this construction activity affected water conditions at the Dennison residence, such an impact can not be ruled out based on the information available at this time. I recommend that the Dennisons contact NYSEG to obtain more information about the work completed at this adjacent property.

CONRAD GEOSCIENCE CORP.

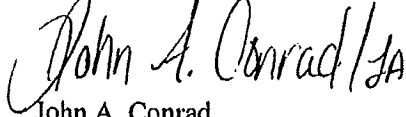


Anschutz Exploration Corporation
#AC100120
June 24, 2010
Page 5

I recommend that we conference with Mr. Dennison to inform him of my water test results.

Sincerely,

CONRAD GEOSCIENCE CORP.

A handwritten signature in black ink that reads "John A. Conrad / JA". The signature is written in a cursive, flowing style.

John A. Conrad
Senior Hydrogeologist

cc: Margot Timbel - AEC
David Perazone - Mason Dixon
Brian Coven - AEC
Joe Yarosz - NYSDEC

CONRAD GEOSCIENCE CORP.



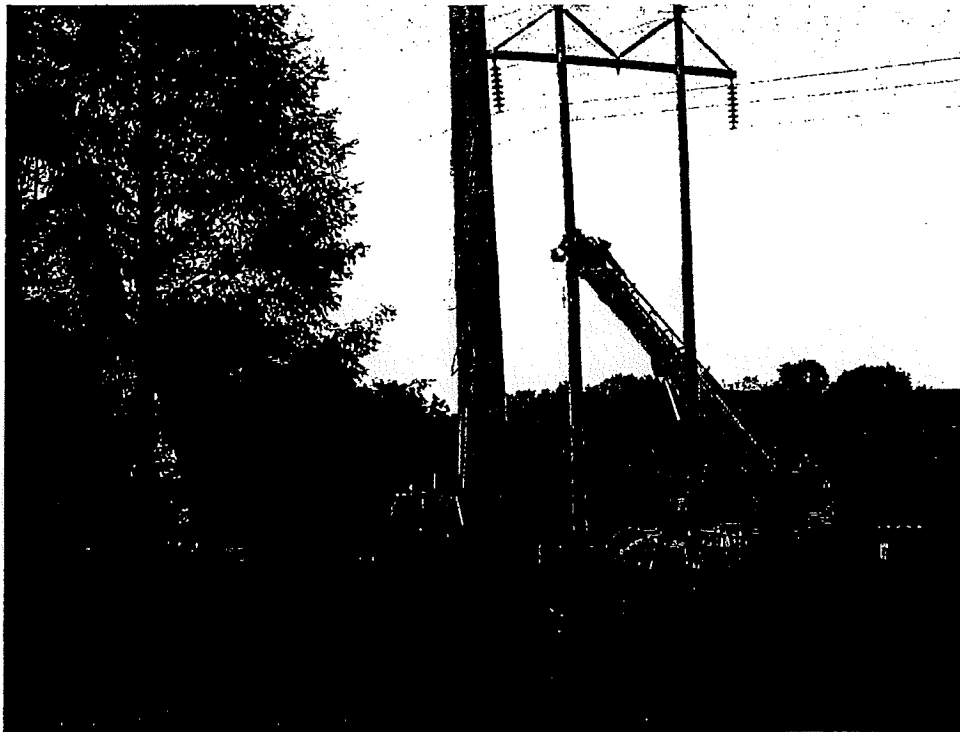
PHOTOS



6-8-10 Dennison Residence. White well vault cover in foreground. View looking SE.



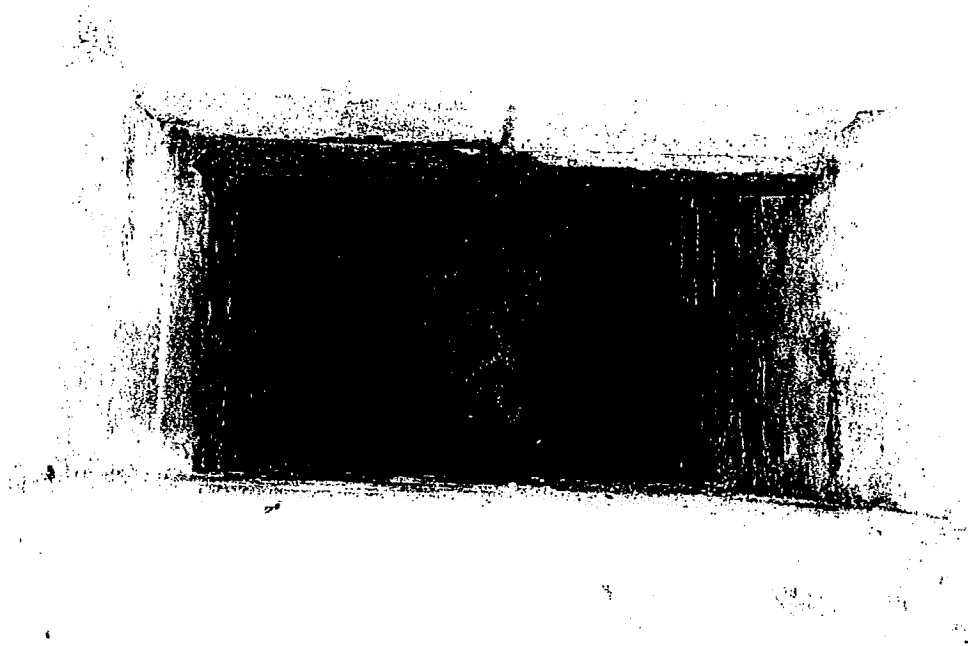
6-8-10 Dow #1 drilling rig visible in background from front yard of Dennison residence.
View looking SW.



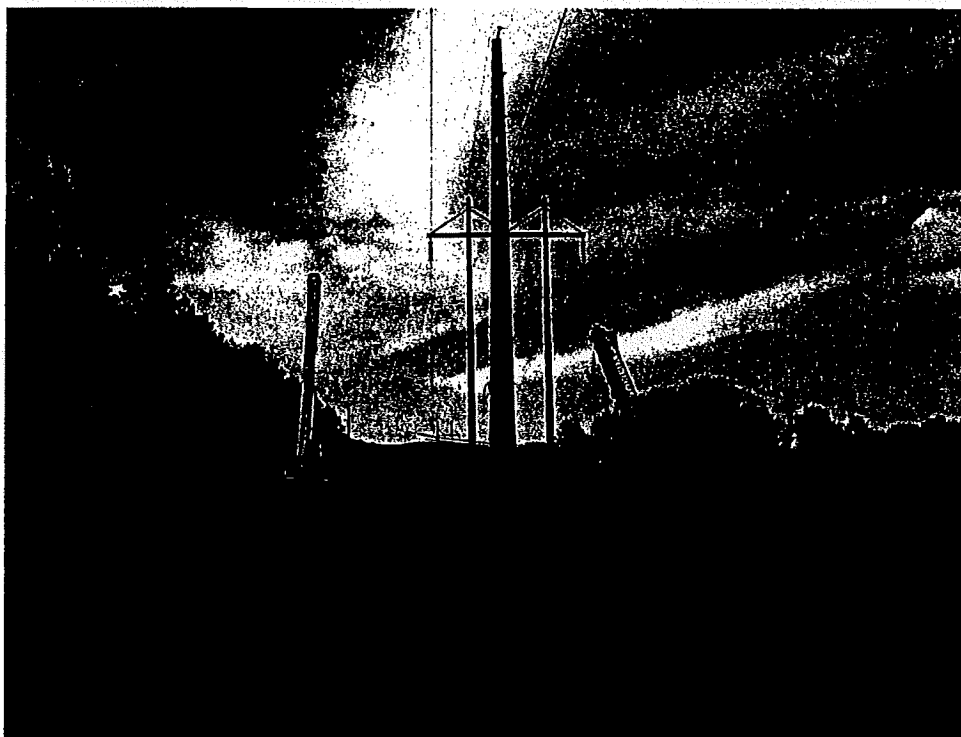
6-8-10 New utility tower on NYSEG property adjacent to Dennison property. The newly installed tower is the large grey metal tower. View looking east from Dennison backyard.



6-8-10 Down #1 Drilling rig in background, viewed from road in front of Dennison residence. View looking SW.



6/8/10 View into well vault entrance in front yard of Dennison residence.
Floor is 8 feet below ground surface. View looking down.



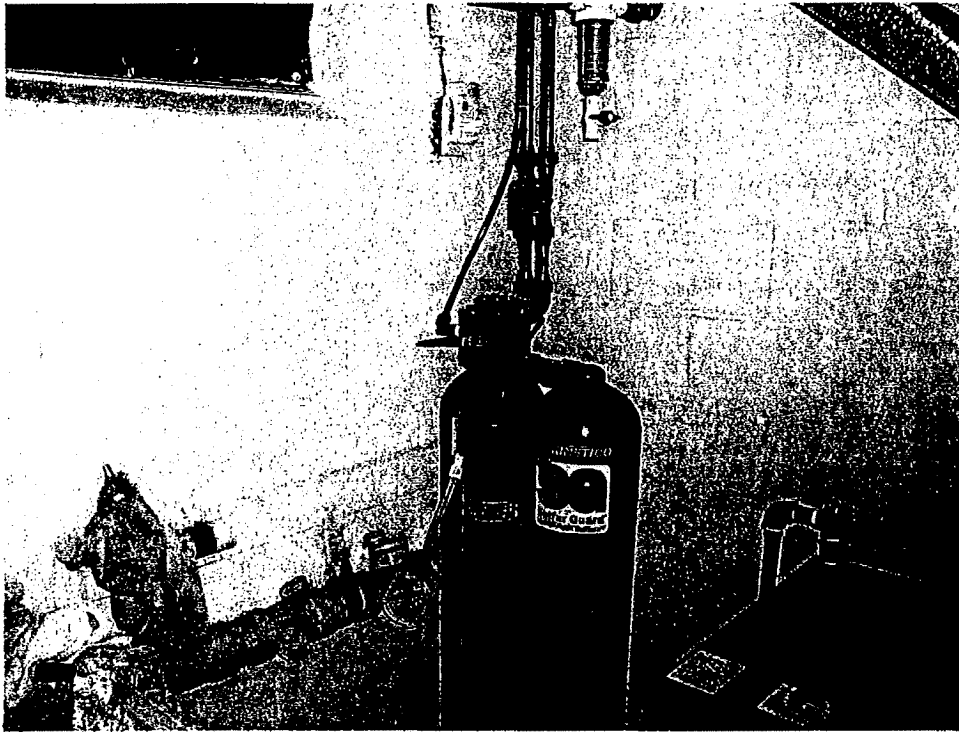
6-8-10 NYSEG transmission tower on adjacent property, viewed from Dennison residence backyard.
View looking east.



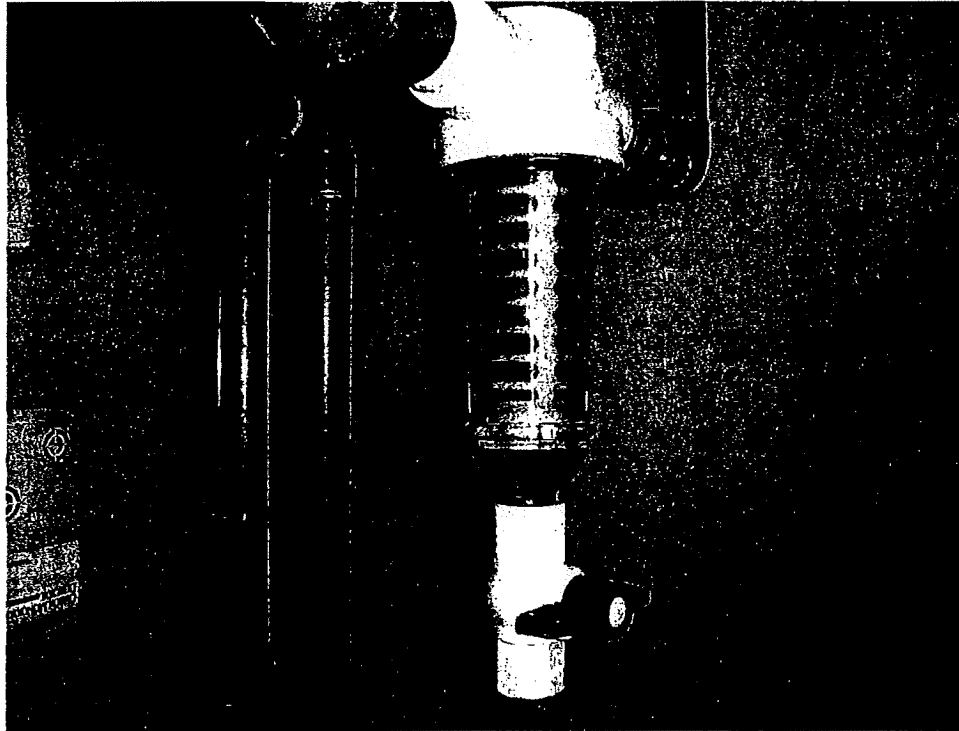
6-8-10 Backyard of Dennison residence. Approximate location of septic leachfield in foreground. Septic tank near SE corner of screened porch in background. View looking north.



6-8-10 Dennison residence. Well vault in mid-ground. Near end of tape measure in foreground shows location of drinking water well, approximately 14 feet from vault. View looking SE.

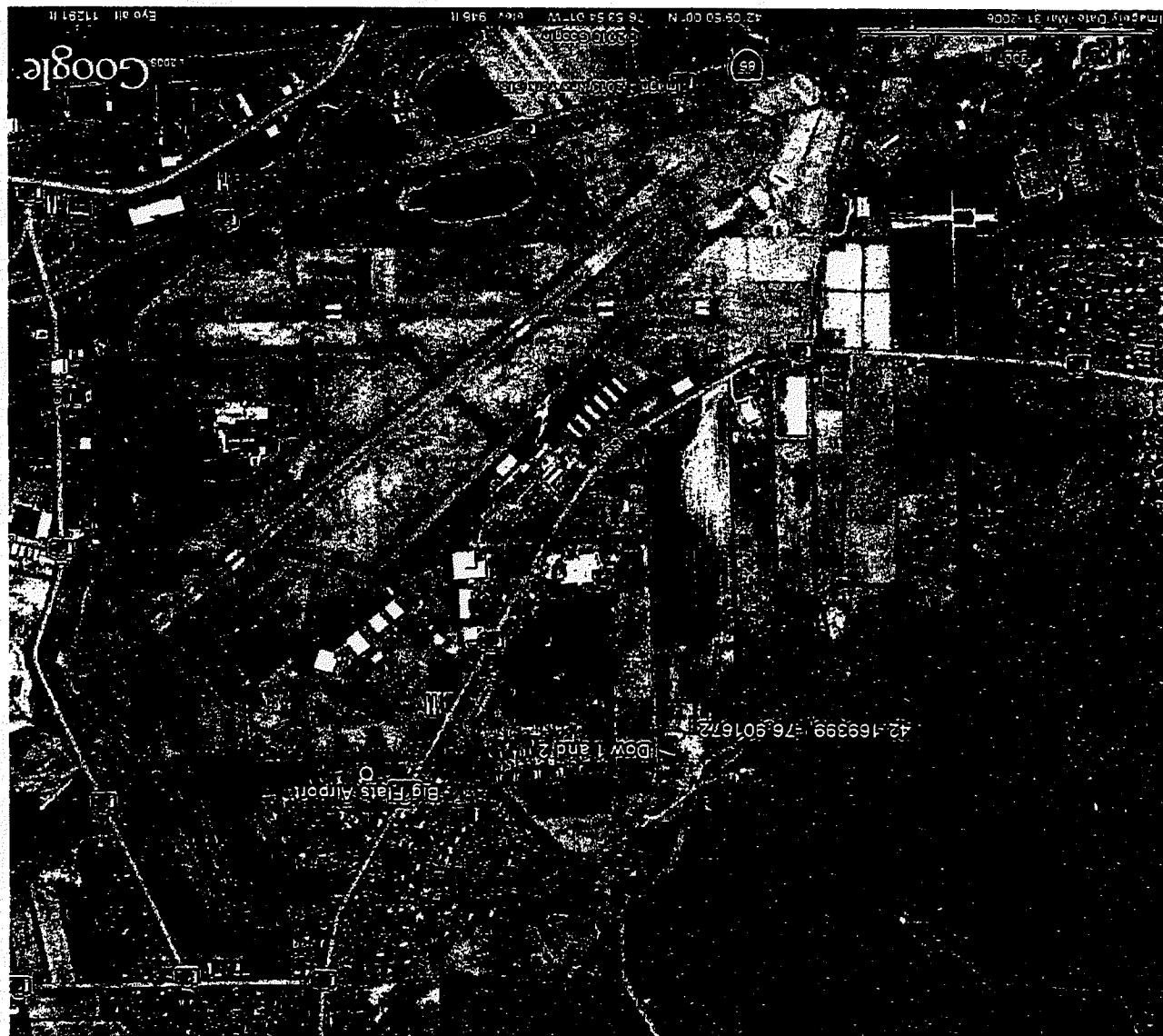


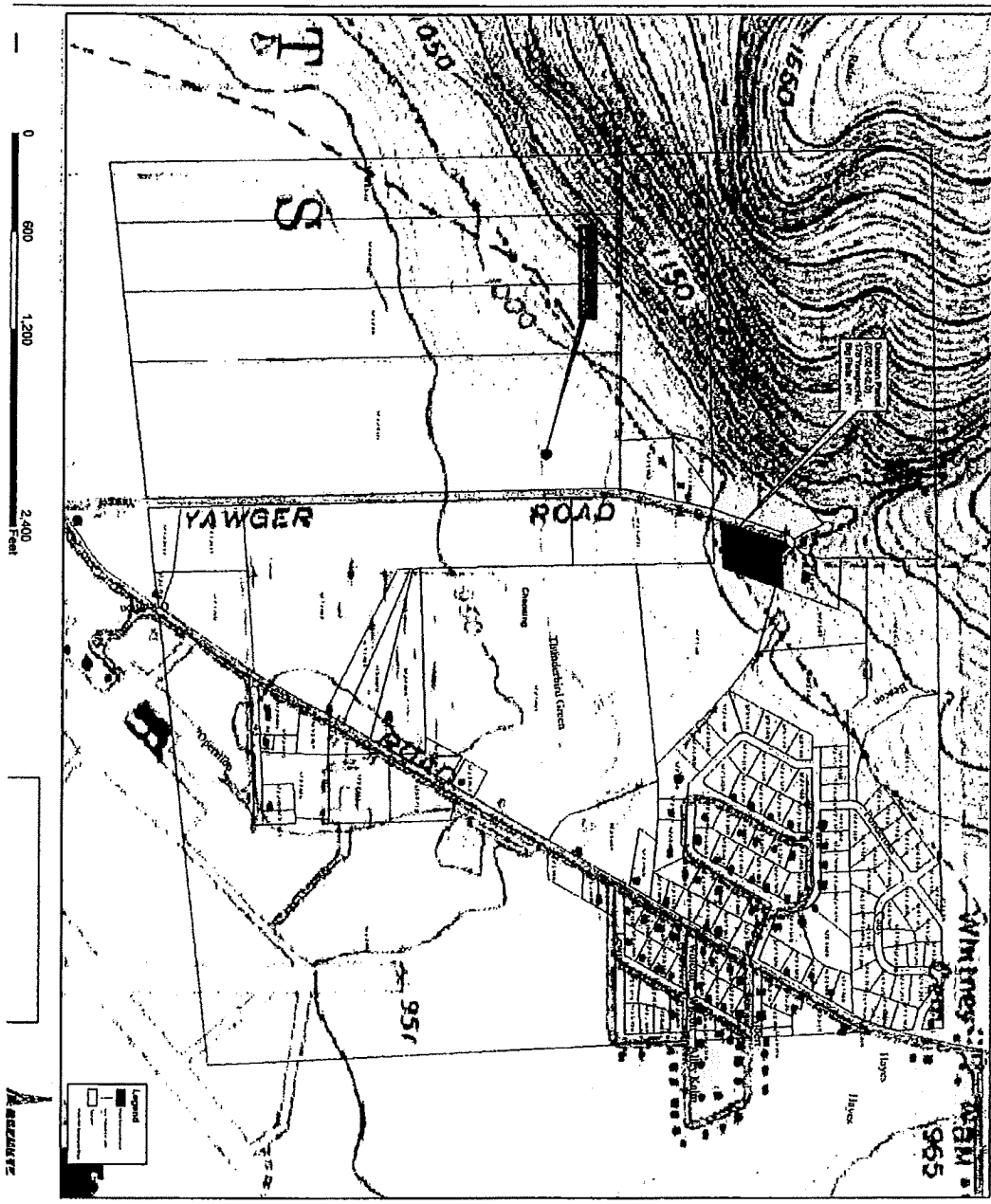
6-8-10 Hydrogen sulfide treatment system in basement of Dennison residence.

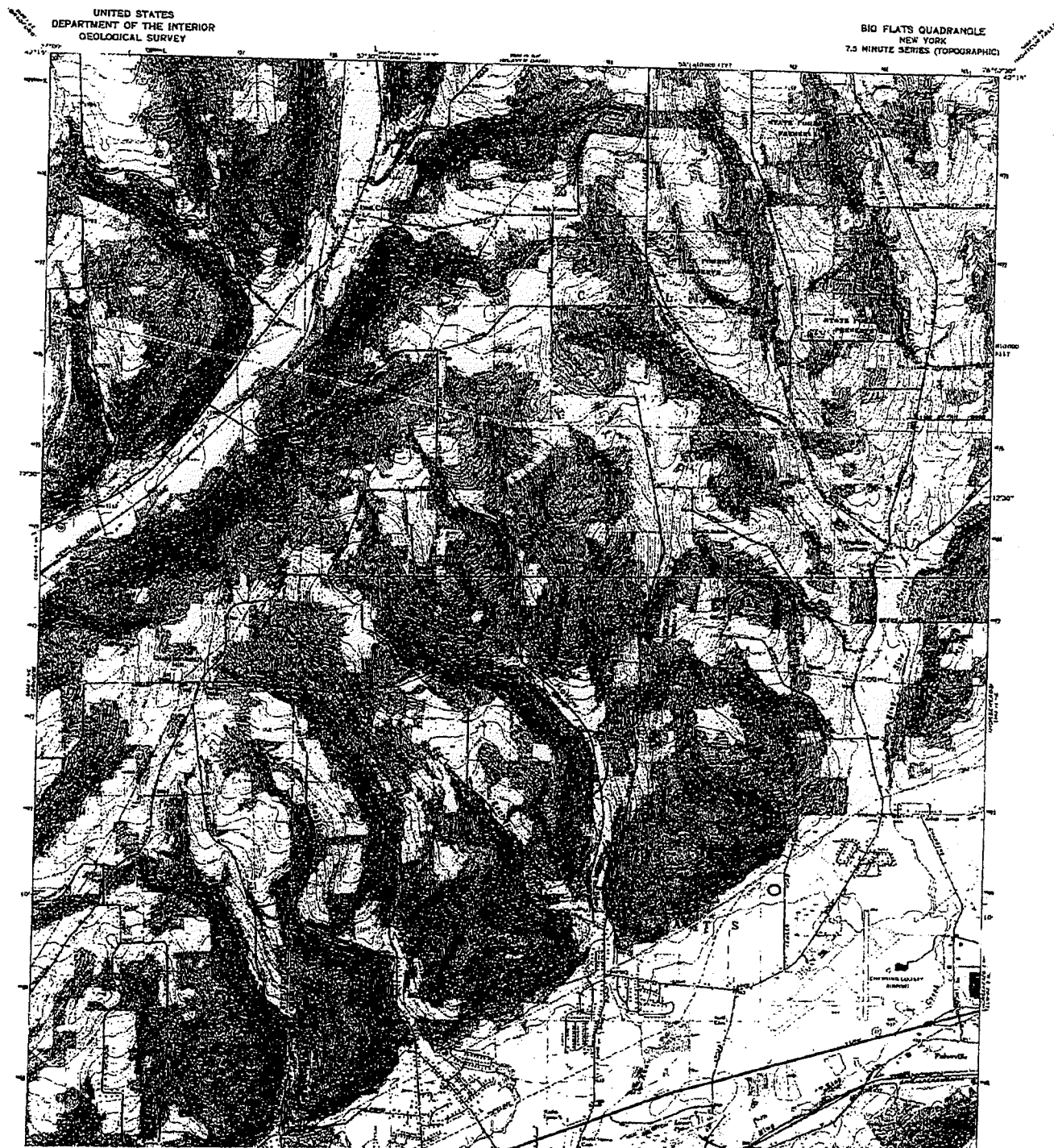


6-8-10 Prefilter on hydrogen sulfide treatment system in basement of Dennison residence. By-pass valve below filter cartridge is sample point for untreated Sample W-1.

DRAWINGS







ANALYTICAL RESULTS



SMITH LABORATORY

ENVIRONMENTAL TESTING
4 SCENIC DRIVE & RT. 9
HYDE PARK, NEW YORK 12538
(845) 229-6536

CERTIFICATE OF ANALYSIS

Client: Conrad Geoscience Corp.

One Civic Center Plaza, Suite 501
Poughkeepsie

NY 12601

PO #

Client Project Name: Dennison
Sample Type: Water
Order ID: 84809
Order comment:

Sample Collected By: John Conrad
Sample Location: W-2
Sample Comment: rec'd at 8 deg C
Sample Number: 148887
Date/Time sample collected: 6/8/2010 8:45
Date/Time sample received: 6/9/2010 9:05
Date/Time sample analyzed: 6/9/2010 14:45
Received by: Melissa
Tech: VZ

Parameter	Test Result*	Units	Test Method
Total Coliform	Absent	CFU/100mL	Collsure
E. coli	Absent	CFU/100mL	Collsure

Test results do meet ~~do not meet~~ EPA drinking water standards.

*Bacteriological test results are expressed as Colony Forming Units.

Results Comment:

Reviewed by: Lab Manager, ELAP Lab ID #10924

11-Jun-10

Smith Laboratory is approved as an Environmental Testing Laboratory in conformance with the National Environmental Laboratory Accreditation Conference (NELAC) Standards. This test report pertains only to the above items analyzed on this sample as received by the laboratory. Information supplied by the client is assumed to be correct.

The total number of pages in this report is 1 (one).



SMITH LABORATORY

ENVIRONMENTAL TESTING
4 SCENIC DRIVE & RT. 9
HYDE PARK, NEW YORK 12538
(845) 229-6538

CERTIFICATE OF ANALYSIS

Client: Conrad Geoscience Corp.

One Civic Center Plaza, Suite 501
Poughkeepsie

NY 12601

PO #

Client Project Name: Dennison
Sample Type: Water
Order ID: 84809
Order comment:

Sample Collected By: John Conrad
Sample Location: W-1
Sample Comment: rec'd at 10 deg C
Sample Number: 148886
Date/Time sample collected: 6/8/2010 20:40
Date/Time sample received: 6/9/2010 9:05
Date/Time sample analyzed: 6/9/2010 14:45
Received by: Melissa
Tech: VZ

Parameter	Test Result*	Units	Test Method
Total Coliform	Absent	CFU/100mL	Collsure
E. coli	Absent	CFU/100mL	Collsure

Test results do meet / ~~do not meet~~ EPA drinking water standards.

*Bacteriological test results are expressed as Colony Forming Units.

Results Comment:

Reviewed by: Lab Manager, ELAP Lab ID #10924

11-Jun-10

Smith Laboratory is approved as an Environmental Testing Laboratory in conformance with the National Environmental Laboratory Accreditation Conference (NELAC) Standards. This test report pertains only to the above items analyzed on this sample as received by the laboratory. Information supplied by the client is assumed to be correct.

The total number of pages in this report is 1 (one).



PARADIGM
ENVIRONMENTAL SERVICES, INC.

Analytical Report Cover Page

Conrad Geoscience

For Lab Project # 10-2339

Issued June 21, 2010

This report contains a total of 11 pages

The reported results relate only to the samples as they have been received by the laboratory.

Any noncompliant QC parameters having impact on the data are flagged or documented on the final report.

All soil/sludge samples have been reported on a dry weight basis, unless qualified "reported as received". Other solids are reported as received.

Each page of this document is part of a multipage report. This document may not be reproduced except in its entirety, without the prior consent of Paradigm Environmental Services, Inc.

The Chain of Custody provides additional information, including compliance with sample condition requirements upon receipt. Sample condition requirements are defined under the 2003 NELAC Standard, sections 5.5.8.3.1 and 5.5.8.3.2.

NYSDOH ELAP does not certify for all parameters. Paradigm Environmental Services or the indicated subcontracted laboratory does hold certification for all analytes where certification is offered by ELAP unless otherwise specified.

Data qualifiers are used, when necessary, to provide additional information about the data. This information may be communicated as a flag or as text at the bottom of the report. Please refer to the following list of frequently used data flags and their meaning:

"ND" = analyzed for but not detected.

"E" = Result has been estimated, calibration limit exceeded.

"Z" = See case narrative.

"D" = Duplicate results outside QC limits. May indicate a non-homogenous matrix.

"M" = Matrix spike recoveries outside QC limits. Matrix bias indicated.

"B" = Method blank contained trace levels of analyte. Refer to Included method blank report.


PARADIGM
 ENVIRONMENTAL SERVICES, INC.

179 Lake Avenue Rochester New York 14608 (585) 647-2530 FAX (585) 647-3311

LABORATORY REPORT OF ANALYSIS

Client: Conrad Geoscience

Lab Project No. 10-2339

Lab Sample No. 7897

Client Job Site: Dennison

Sample Type: Drinking Water

Client Job No.: AC100120

Date Sampled: 6/8/2010

Field Location: W-1

Date Received: 6/10/2010

Parameter	Date Analyzed	Analytical Method	Results (Units)
Chloride	6/11/2010	EPA 300	75.2 mg/L
Nitrate	6/10/2010	EPA 300	0.349 mg/L
Sulfate	6/10/2010	EPA 300	34.3 mg/L
Alkalinity, Total	6/17/2010	SM2320 B	285 mg/L
Nitrite	6/10/2010	SM4500NO2 B	ND<0.01 mg/L
pH	6/10/2010	SM4500 H B	8.7 H
Sulfide	6/14/2010	SM4500 S2 D	ND<0.10 mg/L
Turbidity	6/10/2010	E180.1	2.6 NTU
Manganese	6/17/2010	E200.7	ND<0.0100 mg/L
Lead	6/18/2010	E200.9	ND<0.001 mg/L

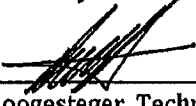
ELAP ID.No.: 10709

Comments:

ND denotes Non Detect.

H denotes analyzed outside of Holding Time

Approved By:


 Bruce Hoogesteger, Technical Director

This report is part of a multipage document and should only be evaluated in its entirety. The Chain of Custody provides additional sample information, including compliance with sample condition requirements upon receipt.

File ID: Conrad 10-2339


PARADIGM
 ENVIRONMENTAL SERVICES, INC.

179 Lake Avenue Rochester New York 14608 (585) 647-2530 FAX (585) 647-3311

LABORATORY REPORT OF ANALYSIS

Client: Conrad Geoscience

Lab Project No 10-2339

Client Job Site: Dennison

Lab Sample No 7898

Client Job No.: AC100120

Sample Type: Drinking Water

Field Location: W-2

Date Sampled: 6/8/2010

Date Received 6/10/2010

Parameter	Date Analyzed	Analytical Method	Results (Units)
Chloride	6/11/2010	EPA 300	79.6 mg/L
Nitrate	6/10/2010	EPA 300	ND<0.010 mg/L
Sulfate	6/10/2010	EPA 300	45.6 mg/L
Alkalinity, Total	6/17/2010	SM2320 B	280 mg/L
Nitrite	6/10/2010	SM4500NO2 B	ND<0.01 mg/L
pH	6/10/2010	SM4500 H B	8.8 H
Sulfide	6/14/2010	SM4500 S2 D	ND<0.10 mg/L
Turbidity	6/10/2010	E180.1	.27 NTU
Manganese	6/17/2010	E200.7	ND<0.0100 mg/L
Lead	6/18/2010	E200.9	ND<0.001 mg/L

ELAP ID.No.: 10709

Comments:

ND denotes Non Detect.

H denotes analyzed outside of Holding Time

Approved By:


 Bruce Hoogesteger, Technical Director

This report is part of a multipage document and should only be evaluated in its entirety. The Chain of Custody provides additional sample information, including compliance with sample condition requirements upon receipt.

File ID: Conrad 10-2339

**PARADIGM**

ENVIRONMENTAL SERVICES, INC.

179 Lake Avenue, Rochester, NY 14608 (585) 647-2530 FAX (585) 647-3311

Client: Conrad Grosclence Corp

Lab Project No.: 10-2339

Client Job Site: Dennison

Client Job No.: AC100120

Sample Type: Drinking Water

Method: EPA 200.7

Date Sampled: 06/08/2010

Date Received: 06/10/2010

Date Analyzed: 06/14/2010

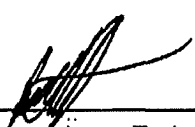
Laboratory Report for Total Hardness

Lab Sample No.:	Field ID	Field Location	Total Hardness (mg/L)
7897	N/A	W-1	4.97 B
7898	N/A	W-2	4.32 B

ELAP ID No.:10958

Comments:

Approved By: _____


Bruce Hoogesteger, Technical Director

This report is part of a multipage document and should only be evaluated in its entirety. Chain of Custody provides additional information, including compliance with sample condition requirements upon receipt.

File ID: 102339.xls



179 Lake Avenue, Rochester, NY 14608 (585) 647-2530 FAX (585) 647-3311

Client: Conrad GrosScience Corp

Lab Project No.: 10-2339

Client Job Site: Dennison

Client Job No.: AC100120

Sample Type: Drinking Water

Method: EPA 200.7

Date Sampled: N/A

Date Received: N/A

Date Analyzed: 06/14/2010

Laboratory Report for Total Hardness

Lab Sample No.:	Field ID	Field Location	Total Hardness (mg/L)
Method Blank	N/A	N/A	1.55

ELAP ID No.:10958

Comments:

Approved By: _____

Bruce Hoogesteger, Technical Director

This report is part of a multipage document and should only be evaluated in its entirety. Chain of Custody provides additional information.
Including compliance with sample condition requirements upon receipt. File ID: 102339.xls


PARADIGM

ENVIRONMENTAL SERVICES, INC.

179 Lake Avenue, Rochester, NY 14608 (585) 647-2530 FAX (585) 647-3311

Client: **Conrad Groscience Corp** Lab Project No.: 10-2339
 Client Job Site: Dennison Sample Type: Drinking Water
 Client Job No.: AC100120 Method : EPA 200.7
 Date(s) Sampled: 06/08/2010
 Date Received: 06/10/2010
 Date Analyzed : 06/14-15/2010

Laboratory Report for Metals Analysis in Water

Lab Sample No.	Field ID No.	Field Location	Iron Results (mg/L)	Sodium Results (mg/L)
7897	N/A	W-1	0.426	195
7898	N/A	W-2	<0.100	211

ELAP ID No.: 10958

Comments:

Approved By: 
 Bruce Hodgesteger, Technical Director

This report is part of a multipage document and should only be evaluated in its entirety. Chain of Custody provides additional information, including compliance with sample condition requirements upon receipt. File ID:102339.xls



ENVIRONMENTAL SERVICES, INC. 179 Lake Avenue Rochester, New York 14608 (585) 647 - 2530 FAX (585) 647 - 3311

Volatile Analysis Report for Non-potable WaterClient: **Conrad Geoscience Corp.**

Client Job Site: Dennison

Lab Project Number: 10-2339

Lab Sample Number: 7897

Client Job Number: AC100120

Field Location: W-1

Date Sampled: 06/08/2010

Field ID Number: N/A

Date Received: 06/10/2010

Sample Type: Water

Date Analyzed: 06/14/2010

Halocarbons	Results in ug / L
Bromodichloromethane	ND< 2.00
Bromomethane	ND< 2.00
Bromoform	ND< 5.00
Carbon Tetrachloride	ND< 2.00
Chloroethane	ND< 2.00
Chloromethane	ND< 2.00
2-Chloroethyl vinyl Ether	ND< 10.0
Chloroform	ND< 2.00
Dibromochloromethane	ND< 2.00
1,1-Dichloroethane	ND< 2.00
1,2-Dichloroethane	ND< 2.00
1,1-Dichloroethene	ND< 2.00
cis-1,2-Dichloroethene	ND< 2.00
trans-1,2-Dichloroethene	ND< 2.00
1,2-Dichloropropane	ND< 2.00
cis-1,3-Dichloropropene	ND< 2.00
trans-1,3-Dichloropropene	ND< 2.00
Methylene chloride	ND< 5.00
1,1,2,2-Tetrachloroethane	ND< 2.00
Tetrachloroethene	ND< 2.00
1,1,1-Trichloroethane	ND< 2.00
1,1,2-Trichloroethane	ND< 2.00
Trichloroethene	ND< 2.00
Trichlorofluoromethane	ND< 2.00
Vinyl chloride	ND< 2.00

Aromatics	Results in ug / L
Benzene	ND< 0.700
Chlorobenzene	ND< 2.00
Ethylbenzene	ND< 2.00
Toluene	ND< 2.00
m,p-Xylene	ND< 2.00
o-Xylene	ND< 2.00
Styrene	ND< 5.00
1,2-Dichlorobenzene	ND< 2.00
1,3-Dichlorobenzene	ND< 2.00
1,4-Dichlorobenzene	ND< 2.00

Ketones	Results in ug / L
Acetone	ND< 10.0
2-Butanone	ND< 10.0
2-Hexanone	ND< 5.00
4-Methyl-2-pentanone	ND< 5.00

Miscellaneous	Results in ug / L
Carbon disulfide	ND< 5.00
Vinyl acetate	ND< 5.00

ELAP Number 10958

Method: EPA 8260B

Data File: V75892.D

Comments: ND denotes Non Detect
ug / L = microgram per Liter

Signature: _____

Bruce Hoogestegge, Technical Director

This report is part of a multipage document and should only be evaluated in its entirety. Chain of Custody provides additional information, including compliance with sample condition requirements upon receipt.

102339V1.XLS

**PARADIGM**

ENVIRONMENTAL SERVICES, INC. 179 Lake Avenue Rochester, New York 14608 (585) 647 - 2530 FAX (585) 647 - 3311

Volatile Analysis Report for Non-potable Water (Additional STARS Compounds)Client: **Conrad Geoscience Corp.**

Client Job Site: Dennison

Lab Project Number: 10-2339

Lab Sample Number: 7897

Client Job Number: AC100120

Field Location: W-1

Date Sampled: 06/08/2010

Field ID Number: N/A

Date Received: 06/10/2010

Sample Type: Water

Date Analyzed: 06/14/2010

Aromatics	Results in ug / L	Aromatics	Results in ug / L
n-Butylbenzene	ND< 5.00	1,2,4-Trimethylbenzene	ND< 5.00
sec-Butylbenzene	ND< 5.00	1,3,5-Trimethylbenzene	ND< 5.00
tert-Butylbenzene	ND< 5.00		
n-Propylbenzene	ND< 2.00	Miscellaneous	
Isopropylbenzene	ND< 5.00	Methyl tert-butyl Ether	ND< 2.00
p-Isopropyltoluene	ND< 5.00		
Naphthalene	ND< 5.00		
ELAP Number 10958		Method: EPA 8260B	Data File: V75892.D

Comments: ND denotes Non Detect
ug / L = microgram per Liter

Signature: _____

Bruce Hoogesteger, Technical Director

This report is part of a multipage document and should only be evaluated in its entirety. Chain of Custody provides additional information, including compliance with sample condition requirements upon receipt.

102339V1.XLS



ENVIRONMENTAL SERVICES, INC. 179 Lake Avenue Rochester, New York 14608 (585) 647 - 2530 FAX (585) 647 - 3311

Volatile Analysis Report for Non-potable WaterClient: **Conrad Geoscience Corp.**

Client Job Site: Dennison

Lab Project Number: 10-2339

Lab Sample Number: 7898

Client Job Number: AC100120

Field Location: W-2

Date Sampled: 06/08/2010

Field ID Number: N/A

Date Received: 06/10/2010

Sample Type: Water

Date Analyzed: 06/14/2010

Halocarbons	Results in ug / L
Bromodichloromethane	ND< 2.00
Bromomethane	ND< 2.00
Bromoform	ND< 5.00
Carbon Tetrachloride	ND< 2.00
Chloroethane	ND< 2.00
Chloromethane	ND< 2.00
2-Chloroethyl vinyl Ether	ND< 10.0
Chloroform	ND< 2.00
Dibromochloromethane	ND< 2.00
1,1-Dichloroethane	ND< 2.00
1,2-Dichloroethane	ND< 2.00
1,1-Dichloroethene	ND< 2.00
cis-1,2-Dichloroethene	ND< 2.00
trans-1,2-Dichloroethene	ND< 2.00
1,2-Dichloropropane	ND< 2.00
cis-1,3-Dichloropropene	ND< 2.00
trans-1,3-Dichloropropene	ND< 2.00
Methylene chloride	ND< 5.00
1,1,2,2-Tetrachloroethane	ND< 2.00
Tetrachloroethene	ND< 2.00
1,1,1-Trichloroethane	ND< 2.00
1,1,2-Trichloroethane	ND< 2.00
Trichloroethene	ND< 2.00
Trichlorofluoromethane	ND< 2.00
Vinyl chloride	ND< 2.00

ELAP Number 10958

Method: EPA 8260B

Aromatics	Results in ug / L
Benzene	ND< 0.700
Chlorobenzene	ND< 2.00
Ethylbenzene	ND< 2.00
Toluene	ND< 2.00
m,p-Xylene	ND< 2.00
o-Xylene	ND< 2.00
Styrene	ND< 5.00
1,2-Dichlorobenzene	ND< 2.00
1,3-Dichlorobenzene	ND< 2.00
1,4-Dichlorobenzene	ND< 2.00

Ketones	Results in ug / L
Acetone	ND< 10.0
2-Butanone	ND< 10.0
2-Hexanone	ND< 5.00
4-Methyl-2-pentanone	ND< 5.00

Miscellaneous	Results in ug / L
Carbon disulfide	ND< 5.00
Vinyl acetate	ND< 5.00

Data File: V75893.D

Comments: ND denotes Non Detect
ug / L = microgram per Liter

Signature: _____

Bruce Hoogestrop, Technical Director

This report is part of a multi-page document and should only be evaluated in its entirety. Chain of Custody provides additional information, including compliance with sample condition requirements upon receipt. 102339V2.XLS

**PARADIGM**

ENVIRONMENTAL SERVICES, INC. 179 Lake Avenue Rochester, New York 14608 (585) 647 - 2530 FAX (585) 647 - 3311

Volatile Analysis Report for Non-potable Water (Additional STARS Compounds)Client: **Conrad Geoscience Corp.**

Client Job Site: Dennison

Lab Project Number: 10-2339

Lab Sample Number: 7898

Client Job Number: AC100120

Field Location: W-2

Date Sampled: 06/08/2010

Field ID Number: N/A

Date Received: 06/10/2010

Sample Type: Water

Date Analyzed: 06/14/2010

Aromatics	Results in ug / L	Aromatics	Results in ug / L
n-Butylbenzene	ND< 5.00	1,2,4-Trimethylbenzene	ND< 5.00
sec-Butylbenzene	ND< 5.00	1,3,5-Trimethylbenzene	ND< 5.00
tert-Butylbenzene	ND< 5.00		
n-Propylbenzene	ND< 2.00	Miscellaneous	
Isopropylbenzene	ND< 5.00	Methyl tert-butyl Ether	ND< 2.00
p-Isopropyltoluene	ND< 5.00		
Naphthalene	ND< 5.00		

ELAP Number 10958

Method: EPA 8260B

Data File: V75893.D

Comments: ND denotes Non Detect
ug / L = microgram per Liter

Signature: _____

Bruce Hoogesteger, Technical Director

This report is part of a multipage document and should only be evaluated in its entirety. Chain of Custody provides additional information, including compliance with sample condition requirements upon receipt.

102339V2.XLS

PARADIGM ENVIRONMENTAL SERVICES, INC.

179 Lake Avenue
Rochester, NY 14608
(585) 647-2530 • (800) 724-1997
FAX: (585) 647-3311

CHAIN OF CUSTODY

REPORT TO:		INVOICE TO:	
COMPANY: <u>Conrad Geoscience Corp</u>	COMPANY:	LAB PROJECT #: <u>10-2339</u>	CLIENT PROJECT #: <u>MA-010010 AC100120</u>
ADDRESS: <u>1 Civic Center Plaza Suite 501</u>	ADDRESS:	TURNAROUND TIME (WORKING DAYS)	
CITY: <u>Poughkeepsie</u> STATE: <u>NY</u> ZIP: <u>12601</u>	CITY: STATE: ZIP:	<input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input checked="" type="checkbox"/> 5 <input type="checkbox"/> OTHER	
PHONE: <u>(845) 454-2544</u> FAX: <u>(845) 454-2655</u>	PHONE: FAX:	QUOTE #:	
PROJECT NAME/SITE NAME: <u>Dennison</u>	ATTN: <u>Wilson Salls</u>	ATTN: <u>Same</u>	
COMMENTS: <u>Please return cooler.</u>			

DATE	TIME	COMPOSITE	GRAB	SAMPLE LOCATION/FIELD ID	MATRIX	CONTAINERS	GLASS TGS	Fe, Mn	Ng, Hardness	Lead	NO ₃ NO ₂	pH, Alkalinity	Hardness, Cl ⁻	SO ₄ ²⁻	H ₂ S	REMARKS	PARADIGM LAB SAMPLE NUMBER
1 6/8/10	2040		X	W-1	DW	5	X	X	X	X	X	X	X	X	X	ok to do vials here as per J. Dalioia as per John Conrad. EAH 6/11	
2 ↓	2045		↓	W-2	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	(last 5 analytes columns to Adirondack)	7 8 9 7
3																	7 8 9 8
4																	
5																	
6																	
7																	
8																	
9																	
10																	

LAB USE ONLY BELOW THIS LINE

Sample Condition: Per NELAC/ELAP 210/241/242/243/244 / Sent directly to Adk. EAH 6/10

Receipt Parameter	NELAC Compliance
Container Type:	Y <input checked="" type="checkbox"/> N <input type="checkbox"/>
Comments:	
Preservation:	Y <input checked="" type="checkbox"/> N <input type="checkbox"/>
Comments:	
Holding Time:	Y <input checked="" type="checkbox"/> N <input type="checkbox"/>
Comments:	
Temperature:	Y <input type="checkbox"/> N <input checked="" type="checkbox"/>
Comments: <u>10°C iced - from temp blank</u>	

JAC
 Sampled By: W. Salls Date/Time: 6/8/10 - 2045
 Relinquished By: W. Salls Date/Time: 6/9/10 - 1700
 Received By: Elizabeth A. Honch Date/Time: 6/10/10 1115
 Received @ Lab By: _____ Date/Time: _____

Total Cost:

P.L.F.